



LAW OFFICES OF
CORY H. MORRIS
ATTORNEY &
COUNSELOR AT LAW

Via Electronic Case Filing Only

June 12, 2017

Hon. Judge Anne Y. Shields
100 Federal Plaza
P.O. Box 830
Central Islip, New York 11722
Courtroom 830

Re: Proposed Discovery Scheduling Order;
Edmond v. Longwood Central School District et al, 2:16-cv-2871;

Dear Judge Shields:

As your records may reflect, this office represents the Plaintiffs, the Edmond Family, in the above-mentioned matter. Plaintiffs provide this letter, after meeting and conferring with defense counsel, to submit the enclosed Proposed Discovery Scheduling Order to the Court and to respectfully request the resolve of the outstanding motion to compel discovery [D.E. 53], from the Longwood Central School District Defendants ("Longwood") that was filed on or about April 3, 2017.

On June 5, 2017, Plaintiffs requested that the Longwood Defendants either incorporate the following list of items into the Proposed Discovery Scheduling Order or allow for the Plaintiffs to seek a ruling on Plaintiffs' outstanding motion to compel, *inter alia*, the following items as requested in Plaintiffs' Interrogatory Demands and Discovery Demands:

- (1) Disciplinary information (which may be provided for each student) for Longwood Central School District students:
 - a. Identifying Number (ID number);
 - b. Cumulative GPA (end of year);
 - c. Eligible for free or reduced lunch;
 - d. Enrollment history;
 - e. Gender;
 - f. Grade level;
 - g. Limited English proficiency (LEP) designation;
 - h. LEP placement;
 - i. Disciplinary actions;
 - j. Race/ethnicity;
 - k. Special Education designation; and

- I. Special education placement;
- (2) key codes for consequences (discipline) in the Powerschool reports;
- (3) time stamped records of Longwood Security guards working on June 4, 2015;
- (4) Defendant personnel files;
- (5) photographs taken on June 4, 2015 (as per LCSD # 776);
- (6) Incident Report Logs;
- (7) Dispatcher Facility Inspection Report(s);
- (8) Supervisor Tour Report(s); and
- (9) Digital copies of all training materials, including but not limited to security powerpoints and security guard training material.

Although both parties agree upon the filing of the Proposed Discovery Scheduling Order, Plaintiffs contest that the above items should have been provided after all the parties entered a confidentiality stipulation. The above items remain outstanding after both parties efforts to meet and confer, Plaintiffs bringing the matter before the Court in a phone call conference that ultimately culminated in Plaintiffs filing of a pre-motion letter to compel discovery from the Longwood Central School District Defendants.

We thank the Court for its kind consideration. Should you have any questions or concerns, please do not hesitate to contact the undersigned.

Respectfully Submitted,

CORY H. MORRIS

Encl:

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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DAVID EDMOND, CAROL EDMOND
And TOM EDMOND,

Plaintiffs,

16-CV-2871 (JFB)(AYS)

- Against -

LONGWOOD CENTRAL SCHOOL
DISTRICT, SUFFOLK COUNTY, SUFFOLK
COUNTY POLICE DEPARTMENT, SUFFOLK
COUNTY POLICE OFFICER EDWARD
ZIMMERMAN, in his individual and official
capacities, SUFFOLK COUNTY POLICE
OFFICER SGT ISNARDI, in his individual and
official capacities, SUFFOLK COUNTY
POLICE OFFICERS "JOHN AND JANE DOES
1-10," in their individual and official capacities,
LONGWOOD SUPERINTENDANT MICHAEL
R. LONERGAN, in his individual and official
capacity, PRINCIPAL MARIA CASTRO in her
individual and official capacity, LONGWOOD
ASSISTANT PRINCIPAL SCOTT REESE,
in his individual and official capacity, LONGWOOD
SECURITY GUARD SCOTT, in his individual
and official capacity, LONGWOOD SECURITY
GUARDS "JOHN AND JANE DOES 1-10," in their
individual and official capacities and JOHN AND JANE
DOE # 1-10, in their individual and official
capacities,

Defendants.

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**PROPOSED DISCOVERY
PLAN AND SCHEDULE**

Pursuant to the Federal Rules of Civil Procedure 26(f), the parties agree to the following
Joint Proposed Discovery Plan and Scheduling Order:

1. All fact depositions must be completed by: October 31, 2017
2. All expert discovery must be completed by: January 25, 2018
 - a. Expert disclosures pursuant to Rule 26
shall be made by: November 28, 2017

- b. Rebuttal expert disclosures pursuant to Rule 26 shall be made by: December 21, 2017
3. All discovery, including expert discovery, must be completed by: January 25, 2018
4. Submission of pre-motion letters regarding dispositive motions by: February 12, 2018
5. Submission of Joint Pre-trial Order by: As per Judge Bianco's Rules
6. A Pre-trial Conference shall be held on: _____

Dated: June __, 2017

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(914) 574-4510

SO ORDERED:

Honorable Anne Y. Shields
United States Magistrate Judge

Date: _____